

## **REMARKS**

In response to the Office Action dated December 9, 2010, the Assignee respectfully requests reconsideration based on the above amendments and on the following remarks.

Claims 1, 5-14, 36, 39-46, and 52 are pending in this application. Claims 2-4, 15-35, 37-38, and 47-51 were previously canceled without prejudice or disclaimer.

### **Rejection of Claims under § 103 (a)**

The Office rejected claims 1, 5-14, 36, 39-46, and 52 under 35 U.S.C. § 103 (a) as being obvious over U.S. Patent 6,005,861 to Humpleman in view of U.S. Patent 6,493,875 to Eames, *et al.*, in view of U.S. Patent 6,732,366 to Russo, and further in view of U.S. Patent 4,809,069 to Meyer, *et al.*

This rejection has been rendered moot by amendment. These claims have been amended to recite, or to incorporate, features that are not disclosed or suggested by *Humpleman*, *Eames*, *Russo*, and *Meyer*. Independent claim 1, for example, has been amended to recite “*a media bus having a first media bus input that receives the plurality of information signals from the multiple pairs of the tuner and the demodulator, the media bus having three media bus outputs, with a first media bus output connected to the system data bus*” (emphasis added). Independent claim 1 has been amended to recite “*a video overlay processor having three video overlay processor inputs and a video overlay processor output, a first video overlay processor input connected to a second media bus output of the media bus, a second video overlay processor input connected to a third media bus output of the media bus, and a third video overlay processor input connected to the system data bus, the video overlay processor output connected to the system data bus, the video overlay processor receiving the plurality of information signals from the media bus and superimposing a first audio-visual signal over a second audio-visual signal to produce a superimposed signal and outputting the superimposed signal over the video overlay processor output to the system data bus*” (emphasis added). Support for all these features may be found at

least in FIG. 6 of the as-filed application. Independent claims 36 and 52 have been amended to recite similar features.

At least these features are not obvious over *Humpleman, Eames, Russo, and Meyer*. Examiner Saltarelli contends that “overlay processors with two distinct inputs” are well-known and shown, specifically, by *Meyer*’s “PIP” processor. The video overlay processor of the independent claims, however, has “three inputs.” So, while *Humpleman, Eames, Russo, and Meyer* may teach picture-in-picture processor, their picture-in-picture processor does not have “three video overlay processor inputs and a video overlay processor output,” as the independent claims similarly recite. For this reason alone, then, the independent claims cannot be obvious.

Claims 1, 5-14, 36, 39-46, and 52, then, are not obvious over *Humpleman, Eames, Russo, and Meyer*. The independent claims recite many distinguishing features, and the dependent claims incorporate these distinguishing features. One of ordinary skill in the art, then, would not think that these claims are obvious. The Office is respectfully requested to remove the § 103 (a) rejection of these claims.

### **Traversal of “Official Notice”**

#### **1) Traversal of “A/D Converters”**

The Assignee traverses Examiner Saltarelli’s “Official Notice.” Examiner Saltarelli takes “Official Notice” that some features of the pending claims are well known. Examiner Saltarelli, for example, asserts that the use of analog-to-digital converters are notoriously well-known. Whether or not this assertion is true, this is not what is claimed. Independent claim 36, for example, recites “connecting an input of a digital converter to the multiple pairs of the tuner and the demodulator and receiving the analog information signal and converting the analog information signal to digital information” and “connecting an output of the digital converter to a single input of a media bus to receive the digital information at the media bus” (emphasis added). Support for all these features may be found at least in FIG. 6 of the as-filed application.

The Assignee thus disagrees with this assertion and, respectfully, believes that Examiner Saltarelli is factually incorrect. The Assignee believes that “*connecting an output of the digital converter to a single input of a media bus*” is not well-known in the field (emphasis added). The Assignee believes that the circuit architecture illustrated in FIG. 6 is novel and deserving of patent protection, and the mere well-known use of analog-to-digital converters is not reasonably equivalent to the claimed circuit architecture.

The Assignee, then, respectfully, demands that Examiner Saltarelli provide authority for his assertion. As M.P.E.P. § 2144.04 (C) provides, the Assignee hereby respectfully requests Examiner Saltarelli to provide documentary evidence to support his assertion that “*connecting an output of the digital converter to a single input of a media bus*” is not well-known in the field (emphasis added).

## **2) Traversal of “Card Readers”**

Examiner Saltarelli also takes “Official Notice” that card readers are notoriously well-known. Again, this is not what is claimed. Dependent claim 7, for example, recites “*a card reader having a card reader input and a card reader output, the card reader input connected to an output of the decryption logic, the card reader providing authorization for the decryption logic to decrypt the plurality of information signals to produce decrypted digital information*” (emphasis added). Support for all these features may be found at least in FIG. 6 of the as-filed application. Again, the Assignee believes that the circuit architecture illustrated in FIG. 6 is novel and deserving of patent protection, and the mere well-known use of card readers is not reasonably equivalent to the claimed circuit architecture.

The Assignee, then, respectfully, demands that Examiner Saltarelli provide authority for his assertion. As M.P.E.P. § 2144.04 (C) provides, the Assignee hereby respectfully requests Examiner Saltarelli to provide documentary evidence to support his assertion that “*the card*

reader input connected to an output of the decryption logic" is not well-known in the field (emphasis added).

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If any questions arise, the Examiner is invited contact the undersigned at (919) 469-2629 or [scott@scottzimmerman.com](mailto:scott@scottzimmerman.com).

**37 C.F.R. § 1.8 CERTIFICATE OF TRANSMISSION**

I hereby certify that this correspondence is being electronically transmitted via the USPTO EFS web interface on March 4, 2011.

A handwritten signature in black ink, appearing to read "Scott P. Zimmerman", is written over a faint, circular official stamp.

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